

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SZ DJI TECHNOLOGY CO., LTD. and DJI EUROPE B.V.,)	
)	
)	
Plaintiffs,)	
)	
v.)	
)	C.A. No. 16-706-LPS
AUTEL ROBOTICS USA LLC and AUTEL)	
AERIAL TECHNOLOGY CO., LTD.,)	(Consolidated)
)	
Defendants/Counterclaim)	
Plaintiffs,)	
)	
v.)	
)	
DJI TECHNOLOGY, INC., SZ DJI)	
TECHNOLOGY CO., LTD., and DJI EUROPE)	
B.V.,)	
)	
Counterclaim Defendants.)	

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND TIME TO SUBMIT PROPOSED AMENDED SCHEDULING ORDER**

WHEREAS, on March 18, 2019, the Court ordered the parties in the above-captioned action to submit a proposed amended scheduling order by March 22, 2019 (D.I. 345);

WHEREAS, on March 20, 2019, the parties met and conferred regarding the foregoing and exchanged initial case scheduling proposals;

WHEREAS, on March 22, 2019, Defendants/Counterclaim Plaintiffs provided to Plaintiffs/Counterclaim Defendants a detailed case schedule outlining the primary provisions for a proposed amended scheduling order;

WHEREAS, the parties are in the process of exchanging and negotiating a proposed amended scheduling order for the Court's consideration; and

WHEREAS, the parties agree, subject to the Court's approval, that an extension of the deadline for submitting their proposed amended scheduling order would permit them to further consider and exchange scheduling proposals, to discuss the proposals with their respective overseas clients, and to further meet and confer to try and narrow any disputes regarding a proposed amended case schedule.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through their undersigned counsel and subject to the approval of the Court, that the deadline for submission of their proposed amended scheduling order is hereby extended through and including March 29, 2019.

Dated: March 22, 2019

MORGAN, LEWIS & BOCKIUS LLP

/s/ Amy M. Dudash

Jody C. Barillare (#5107)
Amy M. Dudash (#5741)
1007 N. Orange Street
Suite 501
Wilmington, DE 19801
302.574.3000
jody.barillare@morganlewis.com
amy.dudash@morganlewis.com

Kelly E. Farnan (#4395)
Christine D. Haynes (#4697)
RICHARDS, LAYTON & FINGER, P.A.
920 N. King Street
Wilmington, Delaware 19801
(302) 651-7700
Farnan@rlf.com
Haynes@rlf.com

Of counsel:

Qingyu Yin

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ Anne Shea Gaza

Anne Shea Gaza (#4093)
Robert M. Vrana (#5666)
Samantha G. Wilson (#5816)
Rodney Square
1000 N. King Street
Wilmington, DE 19801
302.571.6600
agaza@ycst.com
rvrana@ycst.com
swilson@ycst.com

Of Counsel:

STEPTOE & JOHNSON LLP
Timothy C. Bickham
John Caracappa
Jonathan B. Sallet
Scott M. Richey
Beau M. Goodrick
1330 Connecticut Avenue, NW

Smith R. Brittingham IV
Finnegan Henderson Farabow Garrett &
Dunner LLP
901 New York Ave NW
Washington DC 20001-4413
(202) 408-4000
qingyu.yin@finnegan.com
smith.brittingham@finegan.com

Willard K. Tom
Jon R. Roellke
Ryan Kantor
Bradford A. Cangro
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave., NW
Washington, D.C. 20004-2541
(202) 739-3000
willard.tom@morganlewis.com
jon.roellke@morganlewis.com
ryan.kantor@morganlewis.com
bradford.cangro@morganlewis.com

*Attorneys for Plaintiffs/Counterclaim
Defendants SZ DJI Technology Co. Ltd. and
DJI Europe B.V. and for Counterclaim
Defendant DJI Technology, Inc.*

Washington DC 20036
(202) 429-3000
tbickham@steptoe.com
jcaracap@steptoe.com
jsallet@steptoe.com
srichey@steptoe.com
bgoodrick@steptoe.com

STEPTOE & JOHNSON LLP
Michael Flynn-O'Brien
One Market Street
Steuart Tower, Suite 1800
San Francisco, CA 94105
(415) 365-6700
mflynnobrien@steptoe.com

*Attorneys for Defendants/Counterclaim
Plaintiffs Autel Robotics USA LLC and Autel
Aerial Technology Co., Ltd. (n/k/a Autel
Robotics Co., Ltd.)*

IT IS SO ORDERED this ____ day of _____, 2019.

CHIEF UNITED STATES DISTRICT JUDGE